

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA)	CRIMINAL NO.
)	
v.)	Count 1: 18 U.S.C. § 113(a)(3)
)	Assault with a dangerous weapon
)	
DAVID MICHAEL KEENE)	Count 2: 18 U.S.C. § 924(c)(1)(A)
)	Using, brandishing, and discharging a
)	firearm during a crime of violence
)	
)	Count 3: 18 U.S.C. § 922(a)(6)
)	False statement in connection with
)	acquisition of firearm

FEBRUARY 2003 TERM - At Alexandria

INDICTMENT

COUNT 1

THE GRAND JURY CHARGES THAT:

On or about December 1, 2002, on the George Washington Memorial Parkway in Fairfax County, Virginia, within the special maritime and territorial jurisdiction of the United States, in the Eastern District of Virginia, the defendant, DAVID MICHAEL KEENE, did unlawfully and knowingly, assault Homayoon Ziaee with a dangerous weapon, namely a SIGARMS, SP2340, .40 caliber semi-automatic pistol, serial number SP0006311, with intent to do bodily harm .

(In violation of Title 18, United States Code, Section 113(a)(3).)

COUNT 2

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 1, 2002, in Fairfax County, Virginia, in the Eastern District of Virginia, the defendant, DAVID MICHAEL KEENE, did unlawfully and knowingly use, brandish, and discharge a firearm, namely, a SIGARMS SP2340 .40 caliber semi-automatic pistol, serial number SP0006311, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, specifically, assault with a dangerous weapon in violation of Title 18, United States Code, Section 113(a)(3), as set forth and charged in Count 1 of this Indictment, which description of the crime of violence is re-alleged and incorporated by reference herein.

(In violation of Title 18, United States Code, Section 924(c)(1)(A).)

COUNT 3

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 1, 2002, in Alexandria, Virginia, in the Eastern District of Virginia, the defendant, DAVID MICHAEL KEENE, did unlawfully and knowingly, in connection with the acquisition of a firearm, namely, a SIGARMS SP2340 .40 caliber semi-automatic pistol, serial number SP0006311, from a licensed dealer, make a false and fictitious written statement, which was intended and likely to deceive the dealer with respect to a fact material to the lawfulness of the acquisition of such firearm, specifically, providing his residence address as "5899 Parenham Way, Alexandria, Fairfax, Virginia," when in fact he resided in the District of Columbia.

(In violation of Title 18, United States Code, Section 922(a)(6).)

A TRUE BILL:

FOREPERSON OF THE GRAND JURY

Paul J. McNulty
United States Attorney

By: _____
Justin W. Williams
Assistant United States Attorney
Chief, Criminal Division

Morris R. Parker, Jr.
Assistant United States Attorney

Erik R. Barnett
Assistant United States Attorney

